

U.S. Department of Justice

United States Attorney Southern District of New York

Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

January 17, 2025

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BY CM/ECF

The Honorable Richard M. Berman United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Keonne Rodriguez and William Lonergan Hill, 24 Cr. 82

(RMB)

Dear Judge Berman:

The Court recently granted Defendant William Hill's request to adjourn the upcoming status conference from March 12, 2025 to March 18, 2025. The Government respectfully requests that the Court exclude time under the Speedy Trial Act between March 12, 2025 and March 18, 2025. The exclusion of time is in the interests of justice because it will allow for the defendants to continue to review discovery, prepare their pretrial motions, and prepare for trial. Counsel for both defendants have consented to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

Application grantd. Time is excluded under the Spredy Trial Act for the reasons set forth in this letter.

By: /s/ Andrew K. Chan

Andrew K. Chan / David R. Felton Assistant United States Attorneys Tel: (212) 637-1072 / 2299

cc: Michael Krouse, Esq. (Counsel for Defendant Keonne Rodriguez)

Roger Burlingame, Esq. (Counsel for Defendant William Lonergan Hill)

SO ORDERED: Date: 1/2/25

Richard N. Berman, U.S.D.J.